

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.)
)
 GARY ADAMS) CRIMINAL NO. 04-10342-NG

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(A)

The United States and counsel for Defendant GARY ADAMS file this Joint Memorandum Pursuant to Local Rule 116.5(A) as follows:

- 1) The defendant seeks an additional 30 days to review the discovery produced by the government and to make additional discovery requests. The government does not object to this request.
- 2) The government has produced a ballistics report and a fingerprint examination report. The government agrees to produce additional expert discovery 30 days prior to trial and the defendant agrees to produce expert discovery 14 days prior to trial.
- 3) Because the defendant has asked for additional time to review the discovery produced and to make requests, the parties do not know at this time whether there will be additional discovery produced as a result of future receipt of information, documents, or reports of examinations or tests.
- 4) The defendant may file a motion to suppress and requests the Court to set a date for filing this or other motions under Fed.R.Crim.P. 12(b)(3).

5) The Court has previously entered an Order excluding the period November 30, 2004, through December 28, 2004. The parties agree that the period between December 28, 2004, and the date of the next status conference requested in paragraph 7, also should be excluded for purposes of the Speedy Trial Act.

6) The parties anticipate that a trial will be necessary in this case and that it will last about three days.

7) The parties request that another status conference be scheduled toward the end of February 2005.

Respectfully submitted,

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